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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND **TOXIC SUBSTANCES**

April 15, 1999

MEMORANDUM:

Subject: Acute Toxicity Review for EPA Reg. No.: 71227-G/ Zeomic Type AJ10H Zeolite A

DP Barcode: D251497 Case No: 064336

To:

Marshall Swindell, PM 33 / Tony Kish

Regulatory Management Branch

Antimicrobials Division (7510C) Om W. Bladwell

From:

Ian Blackwell, Biologist

Efficacy Evaluation Team

Efficacy and Science Support Branch Antimicrobials Division (7510C)

Through:

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Applicant:

Shinagawa Fuel Co., LTD.

FORMULATION FROM LABEL:

Active Ingredient(s):

% by wt.

Silver

2.7

Other Ingredient(s):

97.8

Total:

Juhle E.C

100.0%

BACKGROUND: Shinagawa Fuel Co., LTD., has cited three acute toxicity studies to support the registration of their product, "Zeomic Type AJ10H Zeolite A". These studies were conducted using, and reviewed in support of, another Shinagawa product. That product, "Zeomic Type AJ10 D Silver Zeolite A", has been assigned EPA File Symbol 71227-R. That review was completed by ESSB/AD on 3/111/99. The MRID numbers are 446644-01 and 446644-02.

This submission also includes a report with a request for data waivers. This report was not assigned an MRID number. This report requests, among other things, the waiver of the acute inhalation toxicity, primary eye irritation and dermal sensitization studies. Please refer to the attached sheet from Shinagawa's application for pesticide registration.

RECOMMENDATIONS: ESSB findings are:

ESSB questions the similarity of the formulations of EPA File Symbols 71227-R and 71227-G. While both products contain 2.5-2.7% silver as the active ingredient, the amount of "Zeolite A" is not as similar. Also, 71227-R (and 71227-E) contains while 71227-G does not.

In order to reconsider the citation of the studies conducted on 71227-R to support 71227-G, ESSB needs to receive:

- 1. An MSDS of Zeolite A.
- 2. Any other information pertinent to its toxicity or irritation. It would be helpful for Shinagawa's toxicologist to present their case as to why they feel 71227-G is toxicologically similar to 71227-R.

If Shinagawa does not submit the requested information, they will have to submit acute toxicity studies conducted on File Symbol 71227-G to support its registration.

LITELY LINCREDIENT INFORMATION IS NOT INCLUDED

